



## MARTEN LAW

October 5, 2020

Via Electronic Mail and US Mail

Richard Mednick  
U.S. Environmental Protection Agency, Region X  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101  
Mail Code: 11-Co7  
mednick.richard@epa.gov

Re: Harbor Island Superfund Site, East Waterway Operable Unit  
King County, Washington  
EPA's CERCLA Section 104(e)(2) Request for Information and Documents dated  
March 10, 2020:  
Maxum Petroleum Operating Company's Supplemental Production of  
Documents

Dear Richard:

Thank you again for EPA's patience – and your understanding – as Marten's client, Maxum Petroleum Operating Company ("Maxum"), has continued to struggle with extraordinary business impacts from the ongoing COVID-19 pandemic.

As discussed earlier, Maxum is committed to responding fully to EPA's pending CERCLA § 104(e) request. To that end, please find attached Maxum's next tranche of responsive documents, which totals 3,026 pages composing 213 documents, including a portion that marked CBI ("confidential business information").

Due to the continuing risk of coronavirus infection, we are again providing these documents in full in two (2) ways:

1. via cloud-based document exchange—specifically, ShareFile, supported by Citrix; and, to ensure compliance with EPA's technical format requirements,
2. via an identical USB drive sent through U.S. mail.

Looking ahead, Maxum will continue to use best efforts to identify potentially responsive materials, delivering additional rolling productions until all of EPA's questions have been answered. As soon as it is possible to do so reliably, we will also contact you with a concrete estimate of final completion.

Please let us know if you have any questions or would like to discuss.

Sincerely,

A handwritten signature in black ink, appearing to be 'JR' with a stylized flourish extending to the right.

Jonathan Rackoff